

Wednesday, March 6, 2019

Submitted Via email to:

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CitizenBoards@deq.virginia.gov

Members of the Virginia State Air Pollution Control Board
c/o Office of Regulatory Affairs
Department of Environmental Quality
P.O. Box 1105
Richmond, Virginia 23218

Karen Sabasteanski, Policy Analyst, Office of Regulatory Affairs
Virginia Department of Environmental Quality
P.O. Box 1105
Richmond, Virginia 23218
Submitted Via Email

Dear Members of the Virginia State Air Pollution Control Board and Ms. Sabasteanski:

Thank you for the opportunity to comment on the proposed, revised regulation to cut carbon dioxide emissions from fossil fuel-fired power plants and trade carbon allowances with states that are part of the Regional Greenhouse Gas Initiative (RGGI).

The Virginia League of Conservation Voters strongly supports the revised upfront cap of 28 million tons, a substantially stronger baseline than earlier proposals and one that will result in immediate carbon reductions from power plants in 2020, not two, three or four years into the program.

Over the course of its 10-year span, from 2020 to 2030, this rule will result in approximately a 30 percent reduction (8.4 million tons) in carbon emissions, which according to EPA's Greenhouse Gas Equivalencies Calculator is the same as taking 1.6 million cars off the road in Virginia.

This is an ambitious program and by far the largest step forward Virginia's taken to address climate change. We also recognize that carbon cap-and-trade programs are a long-term commitment and that this is just the first phase of a much longer effort that we hope will result in a carbon-neutral electricity sector by 2050.

While we understand the need for a statutory solution to formally join RGGI, and are supportive of such efforts, the regulation before the Air Board is nonetheless an important step forward in the climate fight in the commonwealth.

We share concerns of the environmental community that this rule does not apply to facilities that burn biomass, which is also a carbon intensive fuel source. This is a

limitation of the RGGI model altogether and one that can and should be dealt with under a future rulemaking here in Virginia aside from the regulation currently before this board.

This criticism aside, we believe Virginia's setting itself up to be a part of the nation's most proven, effective, multi-state carbon market – one that has yielded huge economic, public health and environmental benefits in the member states in the mid-Atlantic and Northeast.

Take for example the following facts from Acadia Center's 2017 report ["Outpacing the Nation: RGGI's Environmental and Economic Success"](#):

- In 2016 RGGI states emitted 79,228,039 tons of Carbon Dioxide, falling 8.4 percent below the RGGI cap, and emissions have fallen 40 percent since RGGI launched.
- Average electricity prices across the region have decreased by 6.4 percent since RGGI took effect, while electricity prices in other states have increased by 6.2 percent.
- Since RGGI launched member states have reduced emissions by 15 percent more than other states and experienced 4.3 percent more economic growth.
- The RGGI states have proposed to strengthen the program through 2030, supporting the program's continued environmental and economic success.
- Proposed RGGI reforms will result in 130 million fewer tons of CO₂ and \$1.28 billion in avoided health impacts.

On top of these economic benefits, Abt Associates, in their 2017 study, ["Analysis of the Public Health Impacts of the Regional Greenhouse Gas Initiative, 2009-2014,"](#) outlined the strong public health benefits of capping carbon emissions. They found RGGI had resulted in up to 830 lives saved, more than 8,200 asthma attacks avoided, and 39,000 lost work days averted due to reductions in harmful air pollution from power plants. Abt estimates the economic value of RGGI's health and productivity benefits at a cumulative \$5.7 billion.

By adopting this regulation, the Air Board is setting Virginia on a trajectory to cleaner air, a healthier population, and increased innovation in the clean, renewable energy sector that will in turn drive our economy forward. At the same time, Virginia will be doing its part alongside the other RGGI states to cut carbon emissions and address climate change, even in an era of federal inaction on the largest environmental threat we've ever seen.

The tide is turning in this fight, and Virginia is at the forefront. I respectfully urge the Air Board to move forward with this important rule for the good of clean air, public health and Virginia's economy.

Sincerely,

Michael Town,
Executive Director

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